

INFORMATION ON PERSONAL DATA PROCESSING IN KORADO, a.s.

Dear customers, business partners, visitors of our website and job applicants! In this document, we would like to inform you about the terms and circumstances concerning the processing of your personal data in our Company, personal data protection and your rights related with such data processing.

When processing your personal data, we ensure compliance with the law of the European Union, mainly compliance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (General Data Protection Regulation, hereinafter “GDPR”), as well as compliance with the applicable national legal regulations, particularly the Personal Data Processing Act (Act No. 110/2019 Sb.).

This information concerning personal data processing (hereinafter the “Information”) explains what personal data is collected by our Company from you or about you in the course of our mutual communication, in relation with the use of the products and services we provide to you or in connection with other business relations between us. This Information also explains what personal data we obtain from other persons or other sources and how we use such data.

In addition to this summary Information, you will also find more details about your personal data processing in another document we provide to you within our mutual communication, mainly in the contractual documentation.

Over time, the applicable legal regulations may be amended or our terms, procedures and methods of processing your personal data and its protection may change. We will always notify you of such changes by means of updating this Information, unless the applicable change requires that we also inform you by means of an individual message (a letter or an e-mail).

This version of Information on Personal Data Processing is applicable and effective on 1 October 2021. An adapted version of this document is published on the website <https://www.korado.cz/>.

I. General Information

a. Controller’s Identity and Contact Data

Your personal data controller is KORADO, a.s., company registration number 25255843, with its registered office at Bří Hubálků 869, 560 02 Česká Třebová, registered in the Commercial Register maintained by the Regional Court in Hradec Králové, file no. B 1500 (hereinafter the “Company”)

You may contact the Company, as concerns your personal data protection and processing at the above address or its registered office or via the following e-mail address: proti.korupcni.linka@korado.cz or by means of the data box, ID: kpsetqz.

The Company does not have to appoint a Data Protection Officer. Thus, this function has not been established in the Company. The Company is a mother company of the KORADO Group. In some extraordinary cases your personal data may be also processed by other members of the KORADO Group as data processors.

b. General principals of personal data processing

When processing your personal data, we respect your rights and we mainly comply with the following principles:

- Personal data is processed in a correct, legal and transparent way;
- Personal data collecting is carried out exclusively for legitimate purposes and its processing is performed in a way that is compatible with such purposes;

- When processing personal data, we only use the necessary minimum allowing us to fulfil the defined purposes;
- We take all reasonable and feasible measures to protect personal data upon processing;
- We only process correct and updated personal data; we correct or delete any incorrect or redundant data;
- Personal data is stored for the period needed for the purposes for which such data is processed;
- Personal data processing is carried out exclusively in a way ensuring due personal data protection, including its protection by means of suitable technical and organizational measures preventing its unauthorized or illegal processing and accidental loss, destruction or damage.

c. Categories of the processed personal data (What personal data do we process?)

For the purposes we defined, we mainly process the following personal data categories:

- Identification and address data: name, surname, title, date of birth, address (domicile, mailing or another contact address), as concerns individual entrepreneurs, we also process the trade name or the affix attached to the name, the seat and ID;
- Electronic contact data: phone, mobile phone, fax, e-mail address, data box ID;
- Other electronic data: IP address, location data, data transferred by the customer's internet browser, etc.;
- Other personal data needed to perform the Agreement: bank account number, invoiced amount, etc.;
- Information concerning the credit standing and reliability: records on the fulfilment of the payment obligations, including information from public registers.

Birth number

We will only process your birth number if you provide it voluntarily in a contract or in another place or if required by a legal regulation. In the case that based on a concluded contract or in relation thereto you provide your birth number, you agree as the birth number holder within the meaning of Section 13c (1) of Act No. 133/2000 Sb. that we use your birth number for the purpose of the registration of contracts, contract performance and protection of your rights, as well as to archive, process and use your birth number for the above purposes.

d. Sources of personal data collection (From where and how do we obtain personal data?)

We obtain your personal data mainly from you, third parties, generally available sources or from our own activities. We obtain data directly from you mainly within contract negotiations and also during its performance or in any other manner of mutual communication (personally, in writing, over the phone, electronically – mainly via e-mail, web registration, etc.). We obtain personal data from third parties mainly in cases when such third parties enter a contractual relationship between our Company and you (various types of brokers). We may also obtain personal data from public administration authorities or other third parties when complying with the statutory obligations or based on special legal regulations. In the cases when we exercise our justified interests, particularly our interest to act prudently, we may also obtain your personal data and some other data from public sources - public registers, for example from the trade register, land register, insolvency register or central register of executions and in similar cases also from social networks (if you publish your data there yourself). We obtain your personal data from our activity when assessing the data you provide us in relation with using our products and services.

e. Purpose of personal data processing

We always use and process the obtained personal data only for a certain purpose and in the extent needed for such a purpose. In relation to the character of our relationship with you we process personal data mainly for the following purposes:

- Contract conclusion, contractual performance, dealing with your matters;
- Compliance with our statutory obligations;

- Fulfilment and protection of our justified interests;
- Marketing purposes.

f. Legal title for personal data processing

We must have at least one of the following legal titles (a legitimate reason for processing) to process your personal data:

- Your consent with personal data processing;
- Necessity of personal data processing for our contractual performance;
- Compliance with our statutory obligations;
- A justified interest of our Company, with the exception of cases when your interests or your fundamental rights and freedoms take precedence over our interests.

The most frequent legal title for processing is the necessity of personal data processing for performance of the contract we have concluded with you and compliance with our statutory obligations.

In the course of our contractual or other relationship there may be situations related with your personal data processing that we will not be able to use for a particular purpose without your consent. We will notify you of such situations independently and offer you an opportunity to grant your consent to our Company to use precisely defined personal data for a clearly defined purpose and a pre-set period. You may or may not grant the consent at your discretion. If we are unable to provide any services or products without your consent, you will be notified in advance. You may change your decision at any time and recall any consent granted. By recalling the consent, the legality of data processing based on the consent granted before its recalling shall not be affected.

The particular justified interests of our Company that may also become a legal title for your personal data processing shall always be based on the type of our cooperation or nature of our relationship. It will usually concern a justified interest concerning the protection of our rights, data processing for statistical purposes, ensuring our IT or other security, etc.

g. Personal data transfer to third persons (recipients), personal data transfer abroad

Processing of your personal data is carried out by our Company, as well as by means of third parties, so-called personal data processors. We always strive to select reliable persons and our processors. We always sign a written contract on personal data processing with our processors that includes safeguards for the security of your personal data.

We may only disclose your personal data to third parties as controllers in cases when imposed by a legal regulation or allowed based on your consent. We then hand personal data over in the usual extent to the processors or other recipients – suppliers of external services (usually programming or other supporting technical services, suppliers of computer systems, server services and e-mail distribution services and providers of archiving services), operators of (back-up) servers or operators of technologies that process such personal data for the purpose of ensuring the functionality of the provided services, or to other members of the KORADO Group. We may also disclose your personal data in the necessary extent to our legal, economic and tax advisers and auditors who process data for the purpose of providing consultancy services. Personal data concerning debtors may also be disclosed to the company providing debt insurance services or to other companies with the aim of debt collection. Upon request or in the case of any suspicion of illegal activity, personal data may also be handed over to public administration authorities.

The GDPR limits personal data transfers to foreign countries outside the EU. Our Company does not usually transfer personal data to foreign countries outside the EU. However, your personal data may be processed in a computer system whose servers are located outside the EU, even though we do our best to avoid such situations. In such a case, we would select a company that will fulfil all conditions concerning secure data transfers as approved by the European Commission as a contractual partner. In the event that we decide to transfer your personal data outside the EU, we will notify you in a suitable way, if needed.

h. Method of processing and securing personal data

When processing personal data, our Company always proceeds in a manner that secures your personal data properly and prevents any misuse thereof.

Processing of your personal data may be both manual and automated. Automated processing is carried out in the information systems of our Company or in the information systems of our processors. However, we do not perform any deciding based exclusively on automated processing, including profiling, that would have any legal effects on your person.

Your personal data is processed mainly by the competent employees of our Company who need to have access to personal data to perform their work tasks and who are bound to keep confidentiality concerning any and all facts and data they learned when carrying out their job duties. In addition, the employees of our processors also have access to your personal data; however, only in the extent needed to carry out their activities for our Company.

i. Time for which we will process your personal data

Our Company retains your personal data for the period needed to provide our products and services, to complete the required transactions or for other necessary purposes, such as complying with our statutory obligations, contractual liabilities, dispute resolution and legal enforcement of the concluded agreements. These needs differ in relation to the type of the provided product or service and the type of the contractual relationship and therefore the real time of personal data storage may differ significantly. However, we always collect only such personal data that is necessary for the particular purpose and we do not keep your personal data longer than as set forth in the legal regulations or than is reasonable with respect to the purpose of such processing. When determining the time of personal data processing, we mainly take into account the following facts: (i) the length of the limitation period; (ii) the probability of raising legal claims; (iii) the usual procedures in the given market; (iv) the probability and significance of the risks involved; and (v) any recommendations from the supervisory authorities.

We keep the data that we process based on your consent for the period of such consent validity. After the consent is recalled, we may maintain for a reasonable period (usually up to 4 years) information on how we obtained such consent and what it concerned or when and how it was recalled for the purpose of evidencing fulfilment of our obligations in compliance with the personal data protection regulations.

In extraordinary cases, for example when conducting a litigation, we may store documents containing your personal data even for a longer time to protect our justified interests. It mainly concerns cases when we would have to submit such documents as evidence within a litigation, administration proceedings or within an enforcement procedure (with regard to the statutory limitation period according to the applicable Civil Code, e.g. in relation to the provided warranties).

j. Your rights for personal data protection

At any time in the course of your personal data processing you may exercise the following rights:

- The right to access your personal data and to require copies of your personal data that we process;
- The right for correction and supplementing your personal data in the case that you find out that we process incorrect or misleading data about you;
- The right for your personal data deletion in the case that the terms set forth in the legal regulations have been fulfilled;
- The right for limitation of your personal data processing; in this case, at your request we may limit handling your personal data under certain conditions set forth in the legal regulations;
- The right for your personal data transfer to another controller in the case that we process your personal data based on your consent or for the purpose of a contractual performance and such processing is automated;
- The right to raise objections against your personal data processing, provided that such personal data is processed for the purpose of justified interests of our Company. In the case that you raise an objection, we will not process your personal data until we provide evidence of significant reasons for such processing that will prevail over your interests or rights and freedoms or for the determination, exercising or defending any legal claims. If we process your personal data to offer our products and services and such, we will terminate your personal data processing immediately after you raise an objection.

When we receive a request to exercise any of the above rights, we will inform you about the adopted measures without undue delay, and in any case within one month from the date of the request delivery. If necessary, it is possible to extend the period for two months with regard to the complexity and number of such requests. In certain cases defined in the GDPR, our Company is not liable to satisfy the above request or a part thereof. It will mainly concern cases when such a request is clearly unjustified or unreasonable, mainly because it is repeated. In such cases we may (i) require a reasonable fee taking into account the administrative costs related with the provision of the required information or notifications or with the required acts or (ii) refuse the request. If we receive the above request, but we have reasonable doubts concerning the applicant's identity, we may ask for the provision of supplementary information to verify such identity. We will store the information of your rights exercised in relation to our Company and of the way we dealt with your request for a reasonable period (usually 3-4 years) for the purpose of evidencing such facts, for statistical purposes and to improve our services and protect our rights.

You do not have to provide your personal data to our Company. We will notify you in every particular situation whether the provision of your personal data is a statutory or contractual requirement and whether you are obliged to provide such personal data. We will also notify you what personal data is needed to conclude the particular agreement or provide the service or use the product, and if you refuse to provide such data, we will inform you that we are unable to provide you the offered product or service or conclude the particular agreement with you.

Your personal data may also be recorded incorrectly or it may become outdated. At your request, we will indeed correct or supplement such data. In the case of any changes in your data, please inform us of such changes so that we are able to update the personal data of yours that we process.

If you believe that we are processing your personal data unlawfully or we are breaching your rights in any other way, you may file a complaint with the supervisory authority (Office for Personal Data Protection, Pplk. Sochora 27, 170 00 Prague 7) or ask for judicial protection.

II. Additional Information on Personal Data Processing

The following additional information summarizes other principles of personal data processing and protection relating to certain specific cases. Unless provided otherwise in this additional information, the general information set forth in Art. I will still apply in full.

a. Contractual partners (natural persons)

Categories of the processed personal data

If you are our existing or potential contractual partner, our Company will also process other data in addition to the data defined above, for example data contained in the agreement, the invoiced and settled amounts (debts), data on any ongoing performance and communication with you or your employees. In relation to our mutual communication we may also store some technical data, i.e. the time of each communication and the IP address from which it was sent. If you are our potential contractual partner (entrepreneur) we may process the data obtained from open sources (e.g. from your web pages or your posted advertisements) to contact you via phone and offer you our services. We may store such basic data in our CRM system for possible future contact.

Purpose of personal data processing

The primary purpose of personal data processing is the conclusion and performance of the concluded agreement. In this respect, personal data will be further used to record and duly develop our contractual relations, to check the activity of our employees, for statistical purposes, to further develop our services, i.e. those comprised in the concluded agreements, for our inner administrative procedures, debt collection and the protection of our rights and the rights of third parties (e.g. other contractual partners), mainly against any illegal activities. Data (mainly those obtained within communication with our partners, such as the IP address and time of communication) will also be used to ensure IT security. Personal data will also be used to comply with our statutory obligations, mainly the regulations governing book-

keeping and taxes, regulations concerning personal data protection (i.e. your personal data and the personal data of the persons acting on your behalf), rules on advertisement regulation, etc., and for the purpose of direct marketing (sending of offers with our products and services).

Legal title for personal data processing

The legal title for your personal data processing includes the need to perform our agreement (including collection of the arising debts), protection of your justified interests (recording of contractual relationships, protection against illegal activities, including IT security, other development of our products and services, statistical purposes, processing for direct marketing) and the justified interests of third parties (mainly other contractual partners contributing to the agreement performance) and complying with the statutory obligations (mainly the prevention of illegal activities, fulfilment of the requirements set forth in the personal data protection regulations, book-keeping and complying with the obligations under the tax regulations).

Direct marketing

We may process data on our potential, current or past partners also for the purpose of so-called direct marketing, which typically includes the sending of e-mails or phone contacts to offer similar products or services, as you bought from us in the past. The sending of offers is not limited in time, unless you express your wish to stop having such offers sent to you - in such case we will comply with your request. However, we will still process the basic data on our communication for a reasonable period to be able to document why we used to send you such offers. We will not transfer data of yours used to send you our offers to any third parties (except for our subcontractors - the processors who will carry out processing for us).

Under Section 7 of Act No. 480/2004 Sb. we may send a commercial message to your address (including your e-mail address), you may be contacted by means of unsolicited direct mail comprised of a commercial message concerning our products, businesses and services. You may refuse such direct mailing at any time, preferably by unsubscribing from further communication through the link connected to it for such reason or at the address of our Company seat or via our e-mail address info@korado.cz. Unless you explicitly determine otherwise, such refusal will not affect the sending of other types of commercial communication.

b. Contact persons of our contractual partners

When processing the personal data of our current or potential contractual partners we also process data on their contact persons (e.g. statutory bodies or employees). In this way, we usually process data comprised of the names and surnames of such persons, their e-mail addresses, job titles, phone numbers and any records from our mutual meetings. Such data is processed for the same purpose and in a similar extent and for a similar period, as the data of our contractual partners. The individual employees of our Company may maintain their own lists of contact persons, e.g. in their phone directories or visit card catalogues. The phone numbers called or received through our company devices are also stored for a reasonable period for the purpose of the due clearing of telecommunication services, protection of our rights and differentiation between private and work phone calls. In addition to system administrators, only the employees on whose devices such communication proceeded may access such data.

c. Applicants for job

Categories of the processed personal data

In the case that you are an applicant for a job in our Company, in addition to the basic data concerning your person (identification and contact data) we will also process data from your CV, such data on your education, preceding work experiences, language skills, etc. We may also process data on your references from prior employment or the contact data of your former colleagues or employers that you will provide us together with your consent that we may contact them. In relation to our personal meeting or phone interview we may also write some notes about the impression you made or how your acting corresponds to the data provided in your CV.

In the case that we contact you without your prior consent, we will only do so on the basis of the data that you have published for this purpose (e.g. by means of your profile and in the LinkedIn network, in your advertisement, etc.).

In relation to your response to our job advertisement published on our website we may also store some technical data, i.e. the time of your response and the IP address from which it will be sent.

Sources of personal data collection and the method of its processing

Our primary way of collecting data is directly from you within our communication in any form (in such cases it may usually concern a response to an advertisement, completing a form on a web page, etc.). In some cases (filling of specialised positions) we may obtain your contact data and other information from public sources, such as the LinkedIn network, or from servers, such as jobdnes.cz or jobs.cz., by means of which CVs may be shared (CVs are shared with your consent by such services).

If you agree when contacting you, we will enlist you in the applicable selection procedure for the given position or in our database of applicants. If you refuse, we will not process your data in this way or for this purpose. However, for a reasonable period we may store the basic information that we have contacted and why. You may recall your consent with your participation in the selection procedure at any time (preferably by sending the applicable communication to the contact person from the human resource department of our Company).

For job applicants, we also use this website <https://www.korado.cz/kariera.html>.

If you are successful in our selection procedure and become an employee of our Company, the data submitted by you (mainly your CV) may become a part of your personal file.

Purpose of personal data processing

Your personal data will be used mainly to select the suitable candidate for the position filled within the ongoing selection procedure (including external cooperation). We will also use your basic identification data to protect the rights of our Company or of third parties against any illegal activity that could occur within such activities and to ensure the IT security of our web pages and network.

We will also use data on the way you provided your consent or the basic data on your person to us and how we obtained such data about you to comply with our statutory obligations, mainly the obligations under the personal data protection regulations (to evidence your consent with data processing, etc.) or for the purposes related with the verification of performance of the agreements concluded with operators of the above services and for CV sharing.

By providing your personal data (e.g. in the form of a response to our advertisement or completing our form on the website) or your consent to be enlisted in our selection procedure you are allowing our Company to use the data for the selection of the suitable candidate for the position filled within the ongoing selection procedure or within another concurrent selection procedure for a similar position. If we also wish to use your personal data to fill other positions or for any future selection procedures, we will ask you to grant your consent for such use.

Legal title for personal data processing

The legal base for the aforesaid processing is your consent (for the purpose of your enlisting in the selection procedure or in our database of CVs for the purpose of the job positions offered in the future) and the justified interests of our Company (mainly in the case of the first obtaining of your contact information otherwise than with your consent). We would like to notify you that the provision of your personal data for processing with your consent is voluntary; however, without your consent we will not be able to enlist you in the applicable selection procedures.

Another legal base of the aforesaid processing is complying with the statutory obligations of our Company, mainly as concerns personal data protection regulations (Regulation (EU) No. 2016/679).

Period during which we will process your personal data

Personal data processing for the basic purpose, i.e. for the selection of a suitable candidate to fill a position within an ongoing selection procedure will be carried out until the position is filled and furthermore for the period of 6 months after (to enable us to contact you and offer you the position in the case that the originally selected candidate did not prove worthy; after that our mutual communication may be archived for a reasonable period with the aim to protect our right or the rights of third parties). If we recruit you, the CV you sent and other similar data on your person will become a part of your personal file, which we will process for the period we keep such a file.

As concerns the other purposes defined above (protection of rights, IT security, complying with statutory obligations), we will process the necessary data on your person for a reasonable period.

d. Visitors to the website of the Company (<https://www.korado.cz/>)

Categories of the processed personal data

We mainly process data on your activity on our website, the IP address, the date and time of your access, basic geographic location, etc.

Provided that your data is processed based on your consent, we also process data on the way and time of the consent granting or recalling, including your IP address from which you indicated the applicable consent box.

Sources of personal data collection and the way of its processing

The source of the personal data we process about you is mainly comprised of your activity on our website.

If we need any data that will directly identify your person or allow us to contact you, we will ask you expressly.

We usually process your data in our own computer system or we may use third-party systems (so-called processors).

Purpose of personal data processing

- Measuring the visit rate of our pages;
- Improving the content of our web pages and their development;
- Ensuring the security of our systems and network before external attacks or misuse by the users, according to the normally applicable standard at the given market;
- Contacting in the case of a larger order of our products;
- Organizing seminars and trainings;
- Applying for a free position;
- Organising consumer competitions;
- Book-keeping and complying with other statutory obligations (e.g. documenting consent with personal data processing, etc.).

Cookies

To differentiate the individual computers and individual settings of some services, we use cookie files or similar network indicators on our website. Cookies are small text files that our servers save in the individual computers with the use of the web browser. Cookies may be imagined as the web site memory that recognises the user of the same computer in the case of a repeated visit. Cookies do not serve to obtain any sensitive personal data. Standard web browsers support the administration of cookies. For detailed information, please use the help menu in your browser. If your browser is allowed to use cookies, we will consider it as your consent with the use of standard cookies by our servers.

e. Camera system

A camera system with recording for the purpose of protecting our property is operated in our Company premises. The records are not processed or personified in any way, as concerns personal data. We do not specifically process data from the camera systems and only use it in justified extraordinary cases as evidence to protect our Company.

III. Risks and recommended procedures

All personal data processing carries certain risks with it. They may differ with regard to the extent of the processed data and the method of its processing. We have provided some recommended procedures below that can help you better protect your data:

- When providing your personal data, always consider whether it is really necessary to provide it to a third person. You should mainly consider the provision of any data concerning your personal life and its aspects not related with the purposes for which you provide such data or data determined for publishing (e.g. your comments under articles, etc.). If you believe that we require an excessive amount of data from you, contact us and we will review the appropriateness of our request.

- If you provide us personal data of third persons (your family members, employees, etc.), also consider whether such provision is necessary and needed. If needed, ask for the consent of such third parties.
- If any of our colleagues asks you to provide any data, do not hesitate to ask whether such data provision is really needed or whether the purpose of processing could be reached even without such data.
- Persons under 18 are especially vulnerable. If data provision concerns such persons, all circumstances must be duly considered. It must also be considered whether the consent of such persons or their legal representatives (e.g. parents) with such data provision is needed or not. If you are a person under 18, we recommend that you discuss the matter with your legal representative (e.g. a parent) or contact us in the matter.
- If you log in somewhere with the use of a password, always use a unique and strong password that you will not use for any other devices and accesses. Do not disclose or allow access to your password to anyone. We will never ask you to disclose your password, so be careful as regards various e-mail calls to disclose your passwords, even if they were signed on our behalf. It will probably concern phony messages with the aim to elicit and subsequently misuse your password.
- If you send us confidential data, try to use a secure means of communication, e.g. password protection of the concerned file with coding and disclosing the password by another means of communication.
- If you believe that our Company does not fulfil all obligations or an unauthorized data leakage or another similar event occurred, please inform us as soon as possible.